SUNOCO PARTNERS
MARKETING & TERMINALS
An ENERGY TRANSFER Partnership

Via First Class & Electronic Mail

Erin Willard
Environmental Scientist
US EPA Region III
Office of Air Enforcement and Compliance Assistance (3AP20)
1650 Arch Street
Philadelphia, PA 19103

Re: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook Industrial Complex
Title V Operating Permit 23-00119
Request for an Alternate Testing Plan for 40 CFR Part 63, Subpart ZZZZ

Dear Ms. Willard,

Sunoco Partners Marketing & Terminals L.P. (SPMT) has six (6) diesel engines located at its Marcus Hook Industrial Complex and subject to 40 CFR Part 63, Subpart ZZZZ. Those six diesel engines power six water pumps that are used only when a significant rain event occurs in the facility. The pumps were installed in 1994. As they were subject to Subpart ZZZZ as existing engines located at a major facility and were greater than 500 HP, controls were installed under Pennsylvania Plan Approval 23-0001AD and later incorporated into Tile V Operating Permit 23-00119. The Subpart ZZZZ regulation has specific requirements for notification and testing at full load that are not reasonably achievable due to uncertainty of rainwater. In order to achieve the load conditions required of the regulation, a significant rainfall must occur. Also, the equipment cannot normally run fully loaded for the length of time to do full testing (three, 1-hour runs typically require 4 hours per source). As the amount of water subsides in the facility, the pumps are shutdown as they cannot operate without water.

Below is a summary of the diesel engine pump sets:

Description	Horsepower of Diesel	Standard Capacity
MP05-02 A & B	1745	23,500 GPM
MP05-04 A&B	2294	32,000 GPM
MP05-06 A & B	1184	42,650 GPM

SPMT previously requested alternate testing plans in letters to the EPA dated July 8, 2013 and January 22, 2018. The EPA approved of the alternate testing plans in letters to SPMT dated August 1, 2013 and February 20, 2018. SPMT completed the initial performance testing of engines 2A, 4B, and 6A on September 30, 2015; completed the testing on engines 2B and 6B on November 16, 2018; and completed the testing on engine 4A on December 20, 2018.

Recently the pressure drop across the catalyst was changing by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test for Diesel Engine 2B. Therefore, SPMT cleaned the catalyst and calibrated the pressure transducer and controller on the engine. SPMT is proposing to conduct a new performance test on Diesel Engine

2B to reestablish the operating limitations for the pressure drop across the catalyst and confirm the engine is operating within compliance.

SPMT kindly requests an alternative testing plan to demonstrate compliance with the 23 ppm of CO at 15% O2 (40 CFR 63 ZZZZ Table 2C). SPMT intends to monitor the forecast for significant rain, mobilize our testing contractors, and stage testing equipment near the pumps in preparation for the test.

- Testing of CO in 15 minute runs verses the three 1-hour runs (1-hour run requirement is found in Table 4 item #5 of the standard. Per 40 CFR 63.6630, 15-minute requirement allowed for other equipment).
- 60-day notification of intent to test requirement waived (63.6645(g)).
- Waiver of stratification requirement Method 1 (this was granted for internal combustion engine test for Reference Method 7E). See attached.
- Compliance standard of 23 ppm CO at 15% excess O2 is the applicable standard.

Submittal of testing protocols and final test reports to the appropriate agencies will be compliant with the State and Federal rules.

Please feel free to contact me by email at kevin.smith2@energytransfer.com or by telephone at 610-859-1279.

Sincerely,

Kevin Smith

Kevin Smith
Specialist – Environmental Compliance

Cc: Heather Henry, PADEP Bureau of Air Quality

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUL 27 2011

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Ryan O'Dea
Alliance Source Testing
8020 Counts Massie Road
N. Little Rock, Arkansas 72113

Dear Mr. O'Dea:

In your July 21, 2011 correspondence, you asked for a waiver of the stratification test required in Method 7E (40 CFR 60, Appendix A) when testing reciprocating internal combustion engines. You noted the difficulty in evaluating emission profiles where gas concentrations are constantly varying and exhausts are too small to effectively traverse. These conditions render a stratification test ineffective and inappropriate. Under Federal New Source Performance Standards (40 CFR 60 Subparts IIII and JJJJ), Methods 1 or 1A and Method 7E are required for selecting sampling points and measuring nitrogen oxides (NO_x). Method 7E requires a stratification check before each test.

We agree that a stratification test does not enhance representative sampling and is not appropriate under the noted conditions. We are currently revising Subparts IIII and JJJJ to delete the Method 1 or 1A requirement for sampling point selection. In its place we will specify single-point sampling at the centroid of the exhaust. This new requirement will preclude the need for a stratification test with Method 7E.

We grant your request for a waiver of the stratification test whenever Method 7E is used to determine NO_x emissions from Federally-regulated engines. Single-point sampling at the centroid of the exhaust is adequate. This waiver also applies to carbon monoxide testing. We will be posting this approval on our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties with similar situations.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063 or you may email him at curtis.foston@epa.gov.

Sincerely,

Conniesue B. Oldham, Ph.D., Group Leader
Measurements Technology Group

cc: Melanie King, OAQPS/SPPD/ESD (D243-01)